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VIA ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *McKoy, et al. v. The Trump Corp., et al.*, Case No. 18-cv-09936 (LGS)

Dear Judge Cave:

I am counsel to non-party ACN Opportunity, LLC (“ACN”) in this case. I write to confirm my availability for the discovery conference currently scheduled for May 9, 2022 [ECF No. 408], which Defendants sought to adjourn earlier today due to a conflict [ECF No. 409].

Yesterday, Mr. Shapiro notified all involved counsel of his conflict by email, and indicated his alternate availability during the weeks of May 9 and May 16. I responded to Mr. Shapiro only, providing my overlapping availability on “May 13 after noon; May 16 all day; or May 18 all day.” This morning, Plaintiffs’ counsel provided their availability. Following this exchange, the only date that was available for all involved counsel was May 18, as indicated in Mr. Shapiro’s letter to the Court.

I remain available on May 18. In the event that date is not convenient for the Court, I will work with counsel to identify other available dates, as Mr. Shapiro also indicated. Regarding Plaintiffs’ request to bifurcate the conference [ECF No. 410], I defer to the Court.

Respectfully,

A handwritten signature in black ink that reads "Stephanie E. Niehaus".

Stephanie E. Niehaus

cc: All Counsel of Record (via ECF)